

State of Florida

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**Public Service Commission**

April 16, 1996

**BY FEDERAL EXPRESS**

Mr. William F. Caton  
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1919 M Street, N.W., Room 222  
Washington, D.C. 20554

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Re: Telecommunications Services Inside Wiring,  
Customer Premises Equipment -- CS Docket No. 95-184

Dear Mr. Caton:

Enclosed are the original and twelve copies of the Florida Public Service Commission's comments in the above docket. Please date-stamp one copy and return it in the enclosed self-addressed stamped envelope.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia B. Miller".  
Cynthia B. Miller  
Associate General Counsel

CBM/jb  
Enclosure

cc: International Transcription Service  
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**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.**

In the Matter of:	)	FCC 95-504
	)	CS Docket No. 95-184
Telecommunications Services	)	
Inside Wiring	)	
	)	
Customer Premises Equipment	)	
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**REPLY COMMENTS OF THE FLORIDA PUBLIC SERVICE COMMISSION**

**INTRODUCTION & SUMMARY**

The Florida Public Service Commission (FPSC) files these reply comments in response to the Notice of Proposed Rulemaking Docket Number 95-184 which proposes changes to the FCC's demarcation rules. Our comments address the demarcation point location and service provider access to multiple dwelling units (MDUs). As the FCC considers revising its rules in view of the Telecommunications Act of 1996 and converging technology, we believe the following points should be considered.

The FPSC believes the FCC should place the demarcation point for telephone service in multiple dwelling units at the telephone subscriber's premises. Since states have a significant role in ensuring that adequate quality of telecommunications services is provided to subscribers, we must be able to adequately monitor provision and repair of telecommunications services. Introducing third party responsibility for a portion of the facilities between the exchange service provider and the customer, i.e., building owners and/or landlords, increases the potential for additional costs to subscribers for service, delays in installation and delays in repair.

With respect to situations where multiple local exchange telecommunications providers serve various subscribers in MDUs, we believe it is more efficient for exchange service providers to use local loops available through reciprocal interconnection arrangements than for each provider to install its own cables. This would minimize access problems cited by property owners.

#### **LOCATION OF DEMARCATION**

As technology changes the way telecommunications and video services are delivered to the consumer, so must the regulations that govern the provision of the services. If a demarcation point is to remain as the terminating point of responsibility of the service provider and the beginning point of the responsibility of the subscriber, the demarcation point should be at a location easily accessible by the subscriber, i.e., in the subscriber's premises.

Many real estate management companies filed comments which suggest that a common demarcation point should be established for services such as telecommunications and video in multi-dwelling units (MDU). This would suggest that the demarcation point could be established, as it is in the current FCC rules for telephone service, at the minimum point of entry to the property or at a location determined by the building owner. The FPSC has concerns with this approach. If the property or building owner elects to have the demarcation point in the equipment or cross connection room, the building owner is then responsible for connecting and

maintaining the transmission medium between the demarcation point and the customer.

This may place the customer in a captive situation with little recourse to ensure that adequate service is installed and maintained in a timely manner. We note the increasing use of additional lines for facsimile machines and computers and are aware of instances where building owners were not prepared to make available additional pairs to connect new services without substantial expense to potential subscribers beyond the exchange service provider's tariffed rates.

In addition, if a person currently requests service from an incumbent local exchange company (LEC), this Commission requires, by rule, that service be installed within 3 days of the request. If the building owner does not connect the service, or have sufficient facilities to accommodate the service, this Commission will not have the ability to ensure that Florida's telephone subscribers receive timely installation of service.

An additional concern is the maintenance of the telecommunications service. If a customer contacts the LEC and the tests reveal no problem, depending on whether the LEC dispatched to the premises, the subscriber may be charged. Then the subscriber must contact the building owner. The only way the building owner can test the line is to physically visit the premises. This may result in a cost and delay to the subscriber. If the test of the building owner disputes the test of the LEC, it is not clear what recourse is available to the subscriber who is now faced with a

difficult situation. The subscriber may also be charged by two different entities in an effort to resolve one problem and the problem may remain unresolved.

Changes in local loop technology also affect where the demarcation point should be located. General Instrument Corporation (GIC) explained in its comments that at the time the demarcation rules were developed for telecommunications there was no need to locate network transmission equipment at the customer's premises because each voice telephone circuit was delivered on a dedicated pair of wires, not a shared transmission medium. GIC further commented that telecommunications local loop transmission technology will change dramatically over the next 5 - 10 years with the introduction of advanced broadband networks. The FPSC is concerned that if the demarcation point is not located at the subscriber's premises, advanced types of local loop technology may not be available to tenants of MDUs because building owners may not be able to provide within the building the transmission medium necessary to interface with the advanced technology. Service may be impossible to install because the transmission medium installed and controlled by the building owner is not compatible with that of the service provider selected by the subscriber.

#### **SERVICE PROVIDER ACCESS**

If the demarcation point is established at the subscriber's premises, through interconnection agreements between incumbent LECs and competing local service providers, the same local loop may be utilized in the provision of service by both companies depending on


which one is providing the service. For example, if the incumbent LEC provides the service, it will retain the local loop. If the competitor provides the service and existing LEC cable exists, the competitor should obtain the local loop from the incumbent LEC through interconnection arrangements. This will reduce the need for multiple providers to install additional cables to provide service at the same location. Building owners expressed concern about having sufficient conduit space if multiple local service providers service tenants of a building; requiring such providers to share use of the internal building wiring will substantially reduce this concern. The FCC's rules should require reciprocal interconnection agreements between local exchange service competitors to utilize internal building wiring to further promote competition.

Many property management organizations filed comments that seek to allow building owners to retain ownership and control of the telecommunications facilities to alleviate concerns about security of their tenants. In Florida the telephone companies must access buildings because the demarcation point is at the subscriber's premises. While this cannot be overlooked as a concern, we are not aware of any security problems with the employees of the telephone companies entering the buildings. Further, we believe the advantages of having the local service provider responsible all the way to the subscriber's premises outweighs any security concerns.

### CONCLUSION

The FCC's current demarcation rules potentially place a large gap of responsibility between the company providing local telephone service and its customers in MDUs. This gap may be filled by an entity whose principle business is not telecommunications and who may not provide the same quality of service currently provided to subscribers directly served by the telecommunications company. For the reasons explained herein this gap should be closed by requiring the demarcation point to be established at the subscriber's premises, not at a location chosen by the third party building owner.

Respectfully submitted,

  
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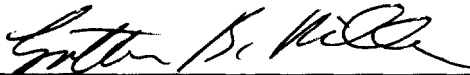
DATED: April 16, 1996

**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

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	)	CS Docket No. 95-184
Telecommunications Services	)	
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	)	
Customer Premises Equipment	)	
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing  
Comments of the Florida Public Service Commission has been  
furnished to the parties of record on the attached list this 16<sup>th</sup>  
day of April, 1996.

  
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